

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

\*

**vs.**

\*

**Case No.: 22-mj-01593 TJS**

**NIJEA NICOLE RICH**

\*

**Defendant**

\*

**MOTION TO MODIFY CONDITIONS OF RELEASE**

**COMES NOW** the Defendant, Nijea Nicole Rich, by and through her attorneys, Michael E. Lawlor, and Nicholas G. Madiou, Brennan, McKenna & Lawlor, Chtd., and respectfully requests that this Honorable Court modify the conditions of release in this case. In the alternative, she requests that this Court set the matter in for a hearing. In support of this motion, counsel states the following.

1. Ms. Rich is charged by Criminal Complaint with Impersonating a Federal Officer, in violation of Title 18 U.S.C. § 912 and Conspiracy to Commit Offenses Against the United States in violation of Title 18 U.S.C. § 371. (Compl. ECF No. 1.)

2. By Order of this Court, Ms. Rich is under the supervision of the United States Pretrial Services Office and has been placed on a curfew from 7 p.m. to 7 a.m. (Order, ECF No. 8 at 2.) Ms. Rich's conditions of release also include location monitoring. (*Id.*) She is currently residing with Ms. Cecelia Dillard, the third-party custodian designated by the Court.

3. By Order of July 18, 2022, this Court temporarily modified Ms. Rich's conditions of release to allow her to leave her home outside of curfew hours for the purpose of accompanying Ms. Dillard to a medical appointment on August 1, 2022. (Order, ECF No. 21.) Ms. Rich complied fully with the temporarily modified conditions of release.

4. At this time, Ms. Rich respectfully asks this Court to modify her conditions of release (1) to extend her curfew to midnight to 7 a.m. and (2) to remove the location monitoring provision. Ms. Rich has been in total compliance with her conditions of release for the nearly four months she has been supervised. She has no criminal history, and there have been no new allegations of criminal activity. Ms. Rich has demonstrated that she can be trusted to follow this Court's orders.

5. Undersigned counsel contacted Mr. James Ridgway from Pretrial Services and has been informed that Pretrial Services opposes the requested modifications.

6. Undersigned counsel also contacted Special Assistant United States Attorney Peter Cooch, who advised that the government also opposes the requested modifications.

7. For these reasons, Ms. Rich respectfully asks this Court to modify her conditions of release (1) to extend her curfew to midnight to 7 a.m. and (2) to remove

the location monitoring provision. In the alternative, Ms. Rich requests that this Court set this matter in for a hearing.

Respectfully submitted,

Brennan, McKenna & Lawlor, Chtd.

/s/

---

Nicholas G. Madiou, Esq.  
Michael E. Lawlor, Esq.  
6305 Ivy Lane, Suite 700  
Greenbelt, Maryland 20770  
(301) 474-0044  
[nmadiou@brennanmckenna.com](mailto:nmadiou@brennanmckenna.com)  
[mlawlor@verizon.net](mailto:mlawlor@verizon.net)

### **CERTIFICATE OF SERVICE**

I hereby certify that on this day, September 16, 2022, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Maryland.

/s/

---

Nicholas G. Madiou